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ALAMEDA_NAS
SSIC 5090.3a

**COMMENTS FROM DTSC-SACRAMENTO ON DRAFT RECORD OF DECISION,
DATED 23 JANUARY 2006**

03/29/2006
DTSC - SACRAMENTO, CA

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Department of Toxic Substances Control

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ALAMEDA POINT
SSIC NO. 5090.3.A



Arnold Schwarzenegger
Governor

March 29, 2006

[REDACTED] Code BPMOW.TLM

Department of the Navy
Base Realignment and Closure Program Management Office West
1455 Frazee Road, Suite 900
San Diego, California 92108-4310

REVIEW OF DRAFT RECORD OF DECISION, SITE 26, ALAMEDA POINT, ALAMEDA CALIFORNIA

Dear [REDACTED]

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Record of Decision (ROD), Site 26, Alameda Point, Alameda, dated January 23, 2006. The Draft ROD presents the selected remedy for Installation Restoration (IR) Site 26, part of Operable Unit 6 at the former Naval Air Station Alameda, now referred to as Alameda Point. The ROD describes the use and history of Site 26, also known as the Western Hangar zone, and presents a summary of site risks based on soil and groundwater investigations to date. The ROD documents that soil at Site 26 does not pose an unacceptable risk to human health or the environment, and therefore recommends no remedial action for soil. Groundwater at Site 26, however, does pose a potential risk to human health, and the Navy has selected a preferred alternative for groundwater that includes in situ chemical oxidation treatment followed by anaerobic in situ bioremediation, groundwater confirmation sampling, and institutional controls. Institutional controls will remain in place until the following remediation goals have been achieved:

- Cis-1,2-dichloroethane: 6 micrograms per liter (µg/l)
- Trichloroethene: 5 µg/l
- Vinyl chloride: 0.5 µg/l

SOLID WASTE MANAGEMENT UNITS

In a letter dated October 3, 2005, DTSC requested further evaluation of five Solid Waste Management Units, including washdown area (WD) 23, and generator accumulation point (GAP) 19, GAP 20, GAP 21, and GAP 22. DTSC also requested that the Navy

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Mr. [REDACTED]
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submit as-built drawings of the hangars to determine if floor drains were present in the buildings. Subsequently, the Navy submitted the following documents to DTSC:

- 1) Report titled "Compilation of Outstanding Solid Waste Management Unit Evaluation Reports," dated November 29, 2005.
- 2) Response to Comments on the Draft Final Proposed Plan for IR 26, dated November 6, 2005.
- 3) A letter from DTSC dated November 4, 1999 documenting DTSC's concurrence of no further action for GAP 19, GAP 20, GAP 21 and GAP 22.

The Navy did not submit as-built drawings of the buildings because the drawings could not be located.

DTSC reviewed the documents submitted by the Navy and also conducted a Site 26 visual inspection on December 5, 2005. Subsequently, DTSC is withdrawing its request for further evaluation of GAPs 19, 20, 21, and 22 and WD-23, based on the following rationale:

- All four of the GAPs were situated on concrete paving, and there is no indication that a release occurred from any of the units.
- Elevated concentrations of contaminants are not present in soil samples collected in the general vicinity of GAPs 19, 20, 21 and 22, and WD-23.

The Navy should ensure that Resource Conservation and Recovery Act (RCRA) procedures have been followed and that pertinent RCRA requirements are met for these units.

SIGNATURE PAGE

The following language should be included above the signature block for Mr. [REDACTED].

"The State of California, Department of Toxic Substances Control had an opportunity to review and comment on the Record of Decision and our concerns were addressed."

Mr. [REDACTED]
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If you have any questions, please contact me at (916) 255-6449 or by e-mail at
[REDACTED]@dtsc.ca.gov.

Sincerely,

[REDACTED]

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Project Manager
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